

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ASHANTE CAGE)	
)	
Plaintiff,)	
)	
v.)	
)	
JEFFREY JOHNSON,)	
)	
Defendant.)	

COMPLAINT AT LAW

NOW COMES the Plaintiff, ASHANTE CAGE, (hereinafter “PLAINTIFF”) by and through her attorney, Blake W. Horwitz from The Blake Horwitz Law Firm, Ltd., pursuant to this Complaint at Law, against the above named Defendant JEFFREY JOHNSON (“DEFENDANT OFFICER”), and states as follows:

I. JURISDICTION

1. The jurisdiction of the Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. § 1983; the Judicial Code, 28 U.S.C. §1331 and §1343(a); the Constitution of the United States; and this Court’s supplementary jurisdiction powers.

II. PARTIES

2. PLAINTIFF, ASHANTE CAGE, is a resident of the State of Illinois, and a citizen of the United States.

3. DEFENDANT, JEFFREY JOHNSON, was at all times material and relevant hereto employed by and acting as a security guard at Kennedy-King College.

III. FACTS

4. The PLAINTIFF is a student at Kennedy-King College.
5. On or about October 29, 2012, the PLAINTIFF went to the library at Kennedy-King College to study.
6. Shortly thereafter, the PLAINTIFF was approached by DEFENDANT JEFFREY JOHNSON, a security guard employed by Kennedy-King College, who was on duty at the time.
7. Without warning, provocation, or legal basis, DEFENDANT JEFFREY JOHNSON struck the PLAINTIFF.
8. The PLAINTIFF did not engage in any action to warrant the use of force against her by DEFENDANT JEFFREY JOHNSON.
9. As a result of being struck by DEFENDANT JEFFREY JOHNSON, the PLAINTIFF sustained significant injuries.
10. As a direct and proximate result of the aforementioned acts of DEFENDANT JEFFREY JOHNSON, the PLAINTIFF was caused to suffer serious injury, pain, suffering and mental anguish both now and in the future.
11. On or about October 29, 2012, the DEFENDANT JEFFREY JOHNSON was on duty at all times relevant to this Complaint, and was a security guard for Kennedy King College.

COUNT I **§1983 Excessive Force** **(JEFFREY JOHNSON)**

12. PLAINTIFF incorporates herein by reference the allegations set forth in paragraphs 1 through 11.

13. DEFENDANT JEFFREY JOHNSON'S actions in using unreasonable force unto PLAINTIFF amounted to an excessive use of force and violated the Fourth Amendment to the United States Constitution.

14. The aforementioned actions of DEFENDANT JEFFREY JOHNSON were the direct and proximate cause of the constitutional violations set forth above, and the PLAINTIFF suffered damages.

WHEREFORE, the PLAINTIFF demands judgment against DEFENDANT JEFFREY JOHNSON, and such other additional relief as this Court deems equitable and just.

Respectfully submitted,

THE BLAKE HORWITZ LAW FIRM
Attorneys for Plaintiff

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